

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB
MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Civil Action No. 2:14-cv-00029-AB

Plaintiffs,

v.

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**MEMORANDUM OF LAW IN SUPPORT OF
MOVANTS' MOTION FOR LEAVE TO FILE A REPLY
IN SUPPORT OF MDL DOCKET NO. 6169
(MOTION FOR LEAVE TO CONDUCT LIMITED DISCOVERY)**

On September 13, 2014, Movants filed a motion for leave to conduct limited discovery for purposes of preparing for this Court's November 19, 2014 fairness hearing. Dkt. No. 6169. On October 2, 2014, the NFL and Class Counsel filed oppositions. Dkt. Nos. 6183, 6185.

Movants respectfully request leave to file a reply memorandum so that Movants may respond to and rebut the contentions raised in the oppositions to Movants' Motion for Leave to Conduct Limited Discovery. A reply is necessary because of the importance of the matter and to correct the misstatements of law and fact in Class Counsel's and the NFL's oppositions. The interests of justice therefore favor granting leave to file a reply. Movants' request for leave to

file a reply memorandum is also timely because it will not delay the Court's consideration of any pending motion and because it is filed within eight business days after the oppositions were filed.

Dated: October 13, 2014

William T. Hangley
Michele D. Hangley
HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER
One Logan Square
18th & Cherry Streets
27th Floor
Philadelphia, PA 19103
(215) 496-7001 (telephone)
(215) 568-0300 (facsimile)
whangley@hangley.com
mdh@hangley.com

/s/ Steven F. Molo

Steven F. Molo
Thomas J. Wiegand
Kaitlin R. O'Donnell
MOLOLAMKEN LLP
540 Madison Ave.
New York, NY 10022
(212) 607-8160 (telephone)
(212) 607-8161 (facsimile)
smolo@mololamken.com
twiegand@mololamken.com
kodonnell@mololamken.com

Martin V. Totaro
Eric R. Nitz
MOLOLAMKEN LLP
600 New Hampshire Ave., N.W.
Washington, DC 20037
(202) 556-2000 (telephone)
(202) 556-2001 (facsimile)
mtotaro@mololamken.com
enitz@mololamken.com

Linda S. Mullenix
2305 Barton Creek Blvd., Unit 2
Austin, TX 78735
(512) 263-9330 (telephone)
lmullenix@hotmail.com

Attorneys for Movants